



PREMIER

November 23, 2010
COMMUNITY BANK

Communications Division
Office of the Comptroller of the
Currency
Public Information Room
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Washington, DC 20219

Jennifer J. Johnson
Secretary
Board of Governors of the
Federal Reserve System
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Avenue NW., Washington,
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Gary A. Kuiper, Counsel
Attn: Comments,
Room F-1072
Federal Deposit Insurance
Corporation
550 17th Street, NW.
Washington, DC 20429

Proposed Agency Information Collection Activities Comment Request
Federal Register / Vol 75, No 189 Thursday September 30, 2010
Consolidated Reports of Condition and Income (FFIEC 031 and 041)
Re: Proposed revisions to the Call Report requirements effective March 31, 2011

Thank you for the opportunity to submit our comments regarding the Memorandum Item for the estimated amount of non-brokered deposits obtained through the use of deposit listing service companies.

Premier Community Bank firmly believes that the agencies should NOT move forward with this addition to the Call Report, as it will place extra and undue burdens on the bank. Accurately identifying and reporting all deposits that are generated through the use of the Internet, deposit listing services and other automated services would be difficult, if not impossible, tasks to accomplish due to the reasons outlined below.

- **Not all listing services serve the same types of customers.**
- **Not all listing service deposits can be easily tracked and controlled.**
- **Not all listing services represent a source of high-yield liquidity.**
Premier Community Bank uses a separate rate sheet for quoting non-existing relationship rates. Currently we are paying 70 – 100 bps less than what we pay our core customers for these listing service deposits.
- **The Memorandum change may dissuade further examination.**
By segregating these deposits on the Call Report, examiners may consider these all as high-risk, high-volatility funding which they are not. I am concerned that they will not analyze these further to realize that this is stable funding.

We appreciate the agencies' consideration of our strong objections to the proposed revisions of the Call Report requirements. We request that the agencies seriously consider the hardship that this proposal will place on community banks. We would also encourage the agencies to weigh that burden against the questionable likelihood that such a change will result in a fair and accurate evaluation of all deposits to be included in the new Memorandum Item.

Sincerely,

Gail Bartz, AVP
Premier Community Bank